From:	PETERSON Jenn L
To:	Joe Goulet/R10/USEPA/US@EPA; Jeremy_Buck@fws.gov; Chris Thompson; Robert.Neely@noaa.gov; Ron Gouguet; Robert Gensemer; Eric Blischke/R10/USEPA/US@EPA; ANDERSON Jim M; Chip Humphrey/R10/USEPA/US@EPA
Subject:	Muliplate / Juvenile Chinook Document Comments
Date:	07/17/2006 03:35 PM

I took a look at the following documents:

Round 2 Subyearling Chinook Tissue Data Report, DRAFT, March 31, 2006 and
Round 2 Multiplate Invertebrate Tissue Data Report, DRAFT, June 12, 2006

and had the following comments and observations (I am not sure if we are submitting comments or not):

General comment on both documents: These data reports could be so much more useful than they are in helping the government team understand the data. Maps illustrating contaminant levels at different stations, and composition of detected analytes would be more productive. While a reviewer can look generally through the tables for patterns, much more interpretation could be gained by better representation of the data. Certainly, I don't have time to create the maps myself. It this way we are restricted from adequate interpretation until the LWG interpretive report is released.

Round 2 Subyearling Chinook Tissue Data Report, DRAFT, March 31, 2006:

1). For calculated totals, non-detect values were represented by zeros. This should be potentially changed to match the HH data rules (we are using these for the eco assessment, right?).

2). Several Chinook had a large percentage of daphids in the stomach contents (one had 358 daphnids - from a fish collected at the RR bridge).

3). Page 8, Section 3.3.2, Summary of Qualified Data: The text states here that "data qualified as estimated or tentatively identified are usable for all intended purposes, with the knowledge that these data may be less precise or less accurate than unqualified data." This should be consistent within the project - the benthic interpretive approach omitted all of the "N" or "NJ" data for use in that model. Also, we should be aware that while combining two analytical results a "J" qualifier is applied if either or both of the results are "J" qualified. That means that one of the original results may not have been qualified (is this how we want it reported?).

4). Page 9: How was the most appropriate dilution result and analytical method determined (this section says it was done by the laboratory or the data validator)? From the text, the selection of the most appropriate dilution method is separate from the selection of the most appropriate analytical method (which was done by the guidelines document). This could especially make a difference with the PAH analysis (SW8270 and SW8270-SIM). Is Gina reviewing this?

5). Table B-9b: How are differences between the LWG and NOAA samples being used? Several of the contaminants have a high percent difference (e.g. see the PAH results; the LWG concentrations are significantly lower than the NOAA values). We should ensure we are selecting the most appropriate method for PAH analysis.

Round 2 Multiplate Invertebrate Tissue Data Report, DRAFT, June 12, 2006:

1.) Due to problems with mass availability, non of the multiplate samples were run for PAHs and limited metals (two samples). This data could have been used to help supplement the dietary approach for these compounds, and should have been priority analysis. What are we going to use the organochlorine data for? How is it going to be use in the risk assessment?

2). It was my understanding that the sample methodology used for the juvenile Chinook stomach content analysis would be used here, due to the limited mass. However, PAH analysis was not run, even though it could have been run on limited sample with elevated detection limits (see Table B-7 in the Chinook report). A 1 gram sample could have been run with a MDL of 1.5 ug/kg. Why was this analysis not run when in many cases there was extra mass?

Where are the dioxin / furan results? It was my understanding that this analysis would be run in the PCDD/Fs/PCBs/DDTs/ analysis with no extra mass requirements.

3). There is definitely a waterborne source in Willamette Cove!

4). Were there any inference problems? Has Gina reviewed?

5). Why were some samples run without lipid analysis to save mass and not others? Why was percent moisture run on the samples (this used a lot of sample).

6). Why was toxaphone removed from the list of pesticide analysis completed by high-resolution gas chromatography/high-resolution mass spectrometry (page 5)?

7). It looks like Daphinids were present and abundant at many stations - they were found in especially high numbers at the International Slip and Fireboat Cove, . However, it is stated (page 11) that "because daphnids are not part of the benthic community, they were sorted and identified in a separate effort". Does this mean they were not included in the chemical analysis? They are very much a part of the epibenthic community, which is what we were sampling with the multiplates.

8). Since this is not a true benthic sample, but artificial substrate elevated in the water column, I don't think it is applicable to conduct invertebrate metrics indices (Table D-2).